

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

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BRENDA RICE

PLAINTIFF

VS.

CIVIL ACTION NO: 1:22cv003-MPM-RP

UNUM GROUP

DEFENDANT

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COMPLAINT

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COMES NOW, Plaintiff, by counsel, and sues the Defendant and for cause of action and would state as follows:

1. Plaintiff is an adult resident citizen of Lowndes County, Mississippi.
2. Defendant is a corporation doing business in the State of Mississippi and is hereinafter referred to as “UNUM”.
3. This action arises under the Employee Retirement Income Security Act, 29 U.S.C. Section 1001 et seq (hereinafter referred to as “ERISA”).
4. At all times pertinent to this cause of action, Plaintiff was a beneficiary/participant in an employee welfare benefit plan, providing, among other things, long term disability benefits through Unum Life Insurance Company of America, whose registered legal name in the state of Mississippi is Unum Group.
5. Plaintiff sought and made application for long term disability benefits pursuant to the requirements of the employee welfare benefit plan, however, the Defendant has refused to pay benefits under the plan.
6. Plaintiff has exhausted all administrative remedies available under the employee welfare benefit plan.

7. Plaintiff brings this suit pursuant to Section 1132 of ERISA to recover the benefits she is due under the plan.

WHEREFORE, Plaintiff prays that process issue and be served upon the Defendant requiring it to answer this Complaint fully and completely, and that this Court determine that Plaintiff is entitled to long term benefits under her employee welfare benefit plan and enter a judgment in favor of the Plaintiff ordering the Defendant to pay all benefits contemplated by the plan, together with interest, costs and attorneys fees and such other relief as the nature of this cause may demand.

Respectfully submitted,

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